USDA United States Department of Agriculture | Forest Service | Deschutes National Forest | 63095 Deschutes Market Road
Bend, OR 97701
541-383-5300

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Dear Forest Users,

The Deschutes National Forest is proposing a forest plan amendment to add aminopyralid to the list of approved herbicides for the forest. The project is located within the boundaries of the Deschutes National Forest in Deschutes, Klamath, Jefferson and Lake Counties.

Because this amendment is programmatic in nature, there are no ground disturbing actions included with this proposal. However, once the decision is signed, the chemical would be available for use. Its use would be evaluated to determine if the scope of effects are within the analysis presented in the 2012 Record of Decision for the Invasive Plant Treatments for the Deschutes and Ochoco National Forests and Crooked River National Grassland (USDA 2012b) as analyzed in the Final Supplemental Environmental Impact Statement for the Deschutes and Ochoco National Forests and Crooked River National Grassland (USDA 2012a).

Background

In 2005, the Pacific Northwest Regional Forester amended all the Land and Resource Management Plans (Forest Plans) in Region 6 to update the invasive plant management program, including approval for the use of ten herbicide active ingredients (USDA 2005b. Pacific Northwest Region Invasive Plant Program Record of Decision. Portland, OR. Referred to as R6 2005 ROD). The R6 2005 ROD, as analyzed in the Final Environmental Impact Statement (USDA 2005a), explained that other herbicide ingredients may be added in the future.

In 2007, an independent contractor, Syracuse Environmental Research Associates, Inc., completed a Human Health and Ecological Risk Assessment for the herbicide active ingredient aminopyralid (SERA 2007). This active ingredient was specifically developed for use in wildland settings.

Proposal

I am proposing to add aminopyralid to the Forest's list of available herbicides to use in the invasive plant program. We need to utilize this chemical as it is less harmful to the environment, is more selective in regards to plant species controlled, and has reduced impacts on non-target species such as grasses. This amendment is a minor modification to the invasive plant program. It would not approve any projects on the ground. Project-level analysis would be required before aminopyralid would be used on the ground.

Information about aminopyralid is summarized in the following table (Table 1). This information is based on the Aminopyralid Risk Assessment (SERA 2007) using peer-reviewed articles from the open scientific literature and current Environmental Protection Agency (EPA) documents. SERA considered worst-case scenarios including accidental exposures and

application at maximum label rates. The risk assessments meet the requirements of the Pesticide Use Handbook, FSH 2109.14 Chapter 20. The SERA Risk Assessment is available at: http://data.ecosystem-management.org/nepaweb/nepa_project_exp.php?project=52625

Table 1. Aminopyralid Characteristics

	Aminopyralid Characteristics
Selectivity	Effective on broadleaf species. Grasses are tolerant.
Soil Activity	Soil Active, degraded by soil microbes, low toxicity to soil organisms
Half Life in Water	Degrades in water in 0.6 day in sunlight. Half- lives longer in water that is not exposed to sunlight.
Half Life in Soil	Two field dissipation studies were performed (in California and Mississippi). The results indicate that aminopyralid is likely to be non-persistent and relatively immobile in the field. Half-lives of 32 and 20 days were determined.
Mobility	Weakly adsorbed to soil, with field dissipation studies showing minimal leaching below the 15 to 30 cm soil depth. Dissipation studies also indicate it is non-persistent and relatively immobile in the field. Models indicate 0.01 % of that applied may reach stream after first significant rainfall.
Human Health	Little to no risk to workers or public from proposed use. Drinking water not affected.
Bio-Concentration Potential	Does not bio-accumulate or bio-concentrate. Rapidly adsorbed and excreted and is not substantially metabolized in mammals.
HCB	None
Birds and Mammals	Low toxicity to birds and mammals
Fish and Invertebrates	Low toxicity to fish or aquatic invertebrates
Amphibians	Low toxicity to amphibians (data is limited).
Aquatic Plants and Algae	Aquatic plants and algae are not susceptible
Bees and Earthworms	Low toxicity to bees and earthworms

Aminopyralid in many cases is a less toxic alternative that is likely to increase the effectiveness of herbicide treatments for many of the weeds of particular concern that occur on the Deschutes National Forest. Two primary reasons that effectiveness would increase are:

1. Aminopyralid is known to be particularly effective on invasive plants that have been difficult to control, including, but not limited to, thistles, knapweeds, houndstongue, and non-native hawkweed. Field observations and trials indicate it may also be effective as a pre-emergent in controlling seed production in annual invasive grasses, such as medusahead rye and cheatgrass, while not impacting native perennial grasses (Kyser, 2012, Rinella 2014, Rinella, 2010).
2. Aminopyralid may be used in a wide variety of site conditions, including next to rivers and streams.

U.S. EPA (2005) has concluded that the use of aminopyralid as a replacement for other herbicides will decrease risk to some non-target species:

"Aminopyralid is a Reduced Risk herbicide that provides reliable control of a broad spectrum of difficult-to control noxious weeds and invasive plants on rangeland and pastures, rights-of-way, and wildlife habitat areas. Aminopyralid has a favorable human health toxicity profile when compared to the registered alternatives for these use sites and will be applied at a lower rate. Its residual action should alleviate the need for repeat applications, resulting in a reduction in the amount of herbicides applied to the environment for the control of these weeds. Aminopyralid has been determined to be practically non-toxic to non-target animals at the registered application rates, compared to the alternatives, and is less likely to impact both terrestrial and aquatic plants."

Currently, Forest Plan management direction on the Deschutes National Forest, as amended, reads:

"Select from herbicide formulations containing one or more of the following 10 active ingredient: chlorsulfuron, clopyralid, glyphosate, imazapic, imazapyr, metsulfuron methyl, picloram, sethoxydim, sulfometuron methyl, and triclopyr...Additional herbicides and herbicide mixtures may be added in thefuture at either the Forest Plan or project level through appropriate risk analysis and NEPA/ESA procedures."

My proposal is to amend this direction to read (additions/changes in bold):

*"Select from herbicide formulations containing one or more of the following **11** active ingredients: **aminopyralid**, chlorsulfuron, clopyralid, glyphosate, imazapic, imazapyr, metsulfuron methyl, picloram, sethoxydim, sulfometuron methyl, and triclopyr...Additional herbicides and herbicide mixtures may be added in the future at either the Forest Plan or project level through appropriate risk analysis and NEPA / ESA procedures."*

2012 Planning Rule Consistency

This amendment would be consistent with the Forest Service 2012 Planning Rule (36 CFR 219) by implementing a minor change to a Forest Plan standard by adding aminopyralid to the list of herbicides available for use. I do not believe this amendment needs to be informed by a stand-alone assessment (§ 219.6 (c)).

This amendment would not negatively affect the sustainability and diversity requirements (§ 219.8 and 219.9) of the 2012 planning rule. Availability of an additional herbicide would help the Forest Service maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area by increasing the effectiveness of invasive plant control while minimizing risk to some non-target plants (grasses). This is part of the underlying purpose and need for the project. The use of aminopyralid would maintain

diversity in native species in areas treated. However, this decision only allows the addition of aminopyralid to the list of herbicides available to use, it does not approve any on the ground treatments. The option to use aminopyralid along with or, in lieu of, other herbicides would not pose additional risks to ecological integrity.

This amendment would not adversely affect the multiple use requirements of § 219.10. The R6 2005 FEIS considered how invasive plant management direction could influence relevant aesthetic values, air quality, cultural and heritage resources, ecosystem services, fish and wildlife species, forage, geologic features, grazing and rangelands, habitat and habitat connectivity, recreation settings and opportunities, riparian areas, scenery, soil, surface and subsurface water quality, timber, trails, vegetation, viewsheds, wilderness, and other relevant resources and uses. Use of an additional herbicide would not influence these findings, and could help reduce the potential for adverse effects on these values from invasive plants or invasive plant treatments.

This amendment would not influence timber harvest suitability (§ 219.11) as no lands would be removed from the suitable timber land base and the potential use of the chemical would only be used on invasive plant species and not on trees available for timber harvest.

Public Involvement

At this time, I am interested in hearing your thoughts about adding aminopyralid to the list of herbicides approved for use on the Deschutes National Forest. We welcome hearing your questions, concerns, issues or other information relevant to this proposed amendment.

Additionally, there will be an opportunity to comment during a 30 day comment period that will occur sometime in the near future.

The draft decision will be subject to a future objection period; details are included under the section titled Objection / Administrative Review Process.

Potential Decision

This action may be categorically excluded from documentation in an environmental impact statement (EIS) or an environmental assessment (EA). The applicable category of actions is identified in agency procedures as "Land management plans, plan amendments, and plan revisions developed in accordance with 36 CFR 219 et seq. that provide broad guidance and information for project and activity decision-making in a NFS unit. 36 CFR 220.6(e)(16)." This action is subject to the objection / administrative review procedures at 36 CFR § 219, Subpart B-Pre-Decisional objection process.

Objection / Administrative Review Process

Individuals and entities who have submitted substantive formal comments related to this proposed plan amendment during any of the opportunities for public comment will have standing to file an objection to the draft decision, issued at a later date, pursuant to 36 CFR § 219.53.

Comments received in response to this solicitation, including names, addresses, email addresses and phone numbers of those who comment, will become part of the public record for this proposed action. Comments submitted anonymously will be accepted and considered; however, anonymous comments will not provide the agency with the ability to provide the respondent with subsequent environmental documents or eligibility to object. Additionally, pursuant to 7 CFR 1.27(d), any person may request the agency to withhold a submission from the public record by showing how the Freedom of Information Act (FOIA) permits such confidentiality. Persons requesting such confidentiality should be aware that, under the FOIA, confidentiality may be granted in only very limited circumstances, such as to protect trade secrets. The Forest Service will inform the requester of the agency's decision regarding the request for confidentiality. Where the request is denied, the agency will return the submission and notify the requester that the comments may be resubmitted with or without names and addresses.

Instructions for Making Comments

Comments would be most useful in the development of this project if received by December 15, 2017. Specific, written comments are most helpful when they identify issues, highlight cause and effect relationships of the proposed action, or refine the action to protect resources or interests while allowing us to be responsive to project goals.

Written, facsimile, hand-delivered, and electronic comments should be submitted to: John Allen, Forest Supervisor, 63095 Deschutes Market Road, Bend, OR 97701. The office business hours for those submitting hand-delivered comments are: 8:00 AM to 4:30 PM Monday through Friday, excluding holidays. Comments can be faxed to 541-383-5535. Oral comments must be provided at the Supervisor's office during normal business hours via telephone or in person. If you choose to contact us by phone, please contact Gery Ferguson, Environmental Coordinator at 541-383-5538 or Sarah Callaghan, Invasive Plant Program Manager at 541-416-6588.

Electronic comments should be submitted as part of the actual e-mail message or as an attachment in Microsoft Word, rich text format, or portable document format only and sent to comments-pacificnorthwest-deschutes@fs.fed.us. For electronically mailed comments the sender should receive an automated electronic acknowledgement from the agency as confirmation of receipt. If the sender does not receive this confirmation of receipt it is the sender's responsibility to ensure timely receipt by other means. E-mails submitted to e-mail addresses other than the one listed above, in other formats than those listed, or containing viruses will not be accepted.

Participants who submit comments on the project may receive future correspondence on this project. In order to reduce paperwork and costs, those who do not comment will not receive future updates on this project unless they sign up on the mailing list on the project web page at http://data.ecosystem-management.org/nepaweb/nepa_project_exp.php?project=52625. On the right side of the webpage under "Get Connected" click on "Subscribe to Email Updates." Alternatively, they can contact Gery Ferguson, Environmental Coordinator at 541-383-5538 or Sarah Callaghan, Project Coordinator to be signed up on the mailing list (see contact information below). Project updates can be viewed at the project website listed above at any time as well.

If you have specific questions regarding the project itself, please contact Sarah Callaghan, Invasive Plant Program Manager by phone 541-416-6588, or by email at sacallaghan@fs.fed.us (please do not submit comments to this email address).

If you have questions on how to submit comments, please contact Gery Ferguson, Environmental Coordinator by email: gferguson@fs.fed.us or by phone: at 541-383-5538 (please do not submit comments to this address).

Thank you for your interest in the Deschutes National Forest and this project. Your comments, concerns, and observations about this project are important to the development of the final project.

Sincerely,

JOHN ALLEN
Forest Supervisor

References

Rinella MJ, SE Bellows, AD Roth. 2014. Aminopyralid Constrains Seed Production of the Invasive Annual Grasses Medusahead and Ventenata.Rangeland Ecology and Management. 67:406-411.

Rinella, MJ, Robert A. Masters, and S.E. Bellows 2010. Growth Regulator Herbicides Prevent Invasive Annual Grass Seed Production Under Field Conditions. Rangeland Ecology & Management, 63(4):487-490

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Syracuse Environmental Research Associates, Inc. Aminopyralid Human Health and Ecological Risk Assessment-Final Report. USDA Forest Service Contract: AG-3187-C-06-0010. June 28, 2007 (SERA 2007).

United States Department of Agriculture. Pacific Northwest Region Invasive Plant Program Preventing and Managing Invasive Plants. Final Environmental Impact Statement, April, 2005. (USDA 2005a).

United States Department of Agriculture. Pacific Northwest Region Invasive Plant Program Preventing and Managing Invasive Plants. Final Environmental Impact Statement, Record of Decision. October 2005. (USDA 2005b).

United States Department of Agriculture Forest Service. Deschutes and Ochoco National Forests and Crooked River National Grassland, Invasive Plant Treatments, Final Supplemental Environmental Impact Statement. April, 2012. (USDA 2012a)

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United States Office of Prevention, Pesticides Environmental Protection and Toxic Substances Agency (7501C). Pesticide Fact Sheet-Aminopyralid. August 10, 2005 (EPA 2005).